

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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January 16, 2020

**By ECF**

Hon. Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

***Re: United States v. Schulte, S2 17 Cr. 548 (PAC)***

Dear Judge Crotty:

As part of the government's 3500 production, we received Bates No. 3513-501, which describes a computer drive whose contents have been produced to us in various formats. However, none of these formats permit us to adequately search and analyze the contents of the drive. We require additional information: specifically, the contents of the drive referenced as "1 TB Western Digital HOD, s/n WD-WCATRC436356."

Since November 2019, the defense, including our technical support assistant Jason Fischer, has repeatedly asked the government for this information. We respectfully seek the Court's assistance and ask that the government be directed to provide the requested information to Mr. Fischer immediately.

Respectfully submitted,

/s/

Edward S. Zas

/s/

Sabrina P. Shroff

cc: All Counsel of Record (by ECF)